

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**LULA WILLIAMS, GLORIA TURNAGE,  
GEORGE HENGLE, and DOWIN COFFY,**

**Plaintiffs,**

**v.**

**Civil Action No. 3:19-cv-00085-REP**

**MICROBILT CORPORATION, PHILIP  
BURGESS, MATT MARTORELLO, and  
KARRIE WICHTMAN**

**Defendants.**

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**DEFENDANT KARRIE WICHTMAN'S MOTION TO DISMISS  
COMPLAINT PURSUANT TO FED. R. CIV. P. 12(b)(2) AND 12(b)(6)**

Pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, Defendant, Karrie Wichtman ("Defendant" or "Wichtman"), submits this Motion to Dismiss Plaintiffs' Complaint. The reasons in support of the motion are set forth in the accompanying memorandum.

WHEREFORE, Defendant, Karrie Wichtman, respectfully requests that the Court (a) grant her Motion to Dismiss for lack of personal jurisdiction, (b) alternatively, grant her motion to dismiss under Rule 12(b)(6) for failure to state a claim for which relief can be granted, and (c) grant such further relief as the Court deems appropriate.

**KARRIE WICHTMAN**

By: /s/ David N. Anthony

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 18th day of April 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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